

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                                 |   |                               |
|---------------------------------|---|-------------------------------|
| <b>UNITED STATES OF AMERICA</b> | § |                               |
|                                 | § |                               |
| <b>V.</b>                       | § | <b>Case No. 4:24-cr-00224</b> |
|                                 | § |                               |
| <b>ENRIQUE ROBERTO “HENRY”</b>  | § |                               |
| <b>CUELLAR and IMELDA RIOS</b>  | § |                               |
| <b>CUELLAR</b>                  |   |                               |

**EXHIBIT B**

**TO**

**DEFENDANTS’ MOTION TO HOLD TRIAL IN LAREDO, TEXAS**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

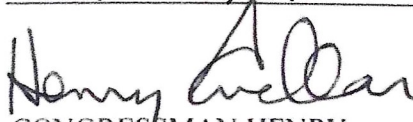
UNITED STATES OF AMERICA §  
§  
V. § Case No. 4:24-cr-00224  
§  
ENRIQUE ROBERTO "HENRY" §  
CUELLAR and IMELDA RIOS §  
CUELLAR §

DECLARATION OF CONGRESSMAN HENRY CUELLAR  
IN SUPPORT OF DEFENDANTS' MOTION TO HOLD TRIAL IN  
LAREDO, TEXAS

1. My name is Enrique Roberto "Henry" Cuellar, I am the United States Congressman for the 28th Congressional District in Texas and I am of sound mind and over the age of 18.
2. I am a defendant in the above-captioned case and make this declaration in support of my motion to transfer venue from the United States District Court for the Southern District of Texas, Houston Division, to the United States District Court for the Southern District of Texas, Laredo Division.
3. I am a resident of Laredo, Texas, and have resided in Laredo for about 65 years.
4. My duties as an elected congressman require me to work in Washington D.C. and in Laredo to serve my district in south Texas.
5. It is at least a five-hour drive from Laredo to Houston and air travel can be expensive and time-consuming depending on the time of year.
6. It would be a great financial burden to relocate to Houston for the duration of my trial.
7. Holding the trial in Houston will also make it very difficult to fulfill my duties to my constituents in Laredo while I am away.
8. Transferring this case to the Laredo Division would greatly reduce the travel burden and associated costs for myself and witnesses. It would also facilitate my access to the evidence in this case.
9. It would be easier for me to fulfill my duties as an elected representative and attend to this matter if the case were relocated to Laredo, Texas.
10. I believe that the interests of justice and the convenience of the parties and witnesses would be best served by transferring this case to the Laredo Division.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 16, 2025, in Laredo, Texas.

  
CONGRESSMAN HENRY

CUELLAR